

## Haddock, Ferne

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**From:** Admin and Rules <DOEAdminRules@state.sd.us>  
**Sent:** Tuesday, October 5, 2021 7:00 AM  
**To:** DOE Admin Rules  
**Subject:** Comment on : ARSD 24:28:01:01 (Meaning of terms)

Name: Jennifer Lowery

Address: 131 N Poplar Ave

City: Tea

State: SD

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Email: Jennifer.Lowery@k12.sd.us

Phone: 60549827005

Comment: Dear Board of Educational Standards, Thank you for your consideration in updating the administrative rule concerning the length of a long-term substitute. The flexibility for leave pursuant to FMLA is important. In addition, I would recommend adding flexibility for leave pursuant to the American Disability Act. Tea Areas has had leave extended beyond the FMLA time period due to an ADA claim. Also, accommodations may need to be considered for teachers in their first year of employment as they are not eligible for FMLA. If a first-year teacher (new to the district) goes on bed rest or has any complications, the teacher is not eligible for FMLA. Thank you for your consideration, Jennifer Lowery  
Superintendent Tea Area School District